

REGER RIZZO KAVULICH & DARNALL, LLP

By: **Richard M. Darnall, Esquire (RD 2726)**

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Attorneys for Defendant, The Phillies (improperly plead as "Philadelphia Phillies")

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY, CAMDEN VICINAGE**

Plaintiff,

JASON WILLIAMS

v.

Defendants,

PHILADELPHIA PHILLIES

Civil Action No.: 05-cv-2346 (JHR)

**APPLICATION FOR CLERK'S
ORDER TO EXTEND THE TIME TO
RESPOND TO THE COMPLAINT
PURSUANT TO LOCAL RULE 6.1(b)
AND CLERK'S ORDER**

Defendant, The Phillies, through its attorneys, Reger Rizzo Kavulich & Darnall, LLP, says as follows:

Application is made for a Clerk's Order extending the time within which The Phillies may answer, move, or otherwise respond to the Complaint filed by Plaintiff herein, and it is represented that:

1. No previous extension has been requested or obtained;
2. The Summons and Complaint were received by The Phillies via Certified Mail, Return Receipt Requested on or about April 7, 2005;
3. This matter was timely removed by Defendant to Federal Court on May 2, 2005;
4. The time to answer, move, or otherwise respond expires on May 9, 2005.

Respectfully submitted,

REGER RIZZO KAVULICH & DARNALL, LLP

DATED: Thursday, May 5, 2005

By: 

RICHARD M. DARNALL, ESQUIRE
Attorneys for Defendant,
The Phillies

The above application is ORDERED GRANTED and the time within which Defendant, The Phillies, shall answer, move, or otherwise respond is extended for fifteen (15) days from May 9, 2005 until May 24, 2005

ORDER DATED: 5/16/05

WILLIAM T. WALSH, CLERK

By: Patty Huchka
Deputy Clerk